

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2009 FEB 12 A 11:57

CLERK'S OFFICE
AT BALTIMORE

BY _____ DEPUTY

JESSE RUDY GONZALEZ
8701 SCHOOL ROAD
PARKVILLE, MD 21234

(Full name and address of the plaintiff)

AMD09CV0347

v.

Civil Action No. _____
(Leave blank. To be filled in by Court.)

KENITH B. ALEXANDER,
LT. GEN, USA
DIRECTOR, NATIONAL SECURITY AGENCY
9800 SAVAGE ROAD
FT GEORGE G. MEADE, MD 20755

(Full name and address of the defendant(s))

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

1. Plaintiff is a resident of PARKVILLE, BALTIMORE County, MARYLAND.
(Fill in county or city and state of residence)
2. Defendant(s) reside(s) or does business at the following location: NATIONAL

SECURITY AGENCY, 9800 SAVAGE ROAD, FT GEORGE G. MEADE, MD 20755

3. This action is brought pursuant to (check all spaces that apply):

☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*,
for employment discrimination on the basis of race, color, religion, sex, or national
origin.

Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et*
seq., for employment discrimination on the basis of age. My date of birth is:

☒ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

☒ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.

4. I am complaining about (check all that apply):

Failure to hire me. I was refused a job on the following date: _____

Termination of my employment. I was terminated from my employment on the following date: _____

☒ Failure to promote me. I was refused a promotion on the following date:

25 June 2006

Other (explain what happened): _____

5. The conduct of Defendant(s) was discriminatory because it was based on (check all that apply):

race color religion sex age national origin disability

6. The facts of my claim are: I WAS REFUSED PROMOTION BASED ON PRODUCTION

STANDARDS NOT BEING MET. PRODUCTION STANDARD REQUIRES USE OF TOOL

NOT U.S.C. SOB COMPLAINT; SPECIFICALLY NOT ADAPTED FOR ACCESSIBLE BY

JOB ACCESS WITH SPEECH (JAWS) TOOL, REQUIRED BY A LEGALLY BLIND INDIVIDUAL

TO EFFECTIVELY ACCESS A COMPUTER.

7. The approximate number of people employed by Defendant is: N/A

8. The events I am complaining about took place on the following dates or time period:

DURING THE CY2005 RATING PERIOD AND FOLLOWING 2005 PROMOTION
CYCLE ENDING 1 AUGUST 2006.

9. I filed charges on the following date: 27 JUNE 2006, with:

Equal Employment Opportunity Commission (EEOC)

Maryland Human Relations Commission

Other (give name of agency and location): EEO COUNSELOR, NATIONAL

SECURITY AGENCY, AT G.G. MEADE, MD 20755

10. I received a right to sue letter (attach copy) on the following date: PRINTED COPY,

WHICH IS UNACCESSIBLE BUT 24 SEPT 2008; READABLE COMPUTER COPY RECEIVED
ON 14 NOV 2008.

WHEREFORE, Plaintiff asks the Court to grant such relief as may be appropriate,

including but not limited to (check all that apply):

Injunctive relief (specify what you want the Court to order): _____

☒ Back pay.

Reinstatement to my former position.

Monetary damages in the amount of: _____

☒ Costs and attorneys fees.

Other (specify): By ACCOMPANYING BENEFITS SUCH AS RETIREMENT AND

THRIFT SAVINGS PLAN CONTRIBUTIONS. WITH COURT FINDING ON MY BEHALF, CONSIDERATION
FOR PROMOTION WITH PEER GROUP FROM 2006 PROMOTION CYCLE.

11 FEBRUARY 2009

(Date)

(Signature)

Jesse Rudy Gonzalez

JESSE RUDY GONZALEZ

8701 SCHOOL ROAD

PARKVILLE MD 21234

JESSE RUDY GONZALEZ

(Printed name, address and phone number of
Plaintiff)

Continuation:

In addition, remedy request includes one promotion for previous institutionalized discrimination experienced, plus a 12 day time off award and 10% salary increase award associated with expenses incurred with having to take time off to attend to administrative legal matters.